

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

TROY ERIC BARNES, #370-871

*

Plaintiff

*

v.

*

Civil Case No.: 1:16-cv-00502ELH

RICHARD J. GRAHAM, JR, *et al.*,

*

Defendants.

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* * * * *

CONSENT MOTION FOR ENLARGEMENT OF TIME

Plaintiff, Troy Eric Barnes, #370-871, by his attorney, Jessie Lyons Crawford, Esquire and the Law Office of Jessie Lyons Crawford, Esquire, move, pursuant to Fed.R.Civ.P. 6(b)(1)(A), for an extension of time to and including December 16, 2016, to file response to the Defendants Warden Richard J. Graham, Jr., Chief of Security Bradley Butler, Secretary Stephen T. Moyer, Officer Nicholas Hetz, Officer Brett Wilburn, Officer Randy Beal, Officer Steven Wilson, Captain William Gordon, and Sergeant William Slate, Motion to Dismiss, or in the Alternative, Motion for Summary Judgment (Document No. 26), filed in the above-captioned case for the following reasons:

1. Plaintiff's response to the motion is presently due on November 7, 2016.
2. Although certain information and materials herein have now been received by the undersigned counsel, it is necessary that additional documents be obtained so that the Plaintiff can prepare a detailed response.
3. An enlargement of time to respond upto and including December 16, 2016 within which to respond to the Defendants' motion should be sufficient to prepare the

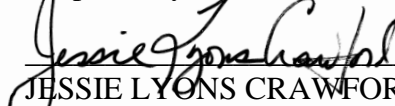
Plaintiff's Response to the Defendants' motion and Memorandum of Law in Opposition to the Defendants' motion.

4. This Motion for Enlargement of Time is not made for purposes of delay.

5. Stephanie Lane-Weber, Esquire, by her authority and on behalf of Nicole Gatewood, Esquire, Defendants' Counsel, kindly consented to this Motion for Extension of Time. See Exhibit 1.

WHEREFORE, it is respectfully requested that this Court grant leave for the Plaintiff to file a response to Defendants' Motion to Dismiss on or before December 17, 2016.

Respectfully Submitted,


JESSIE LYONS CRAWFORD, ESQ.

Federal Bar No. 25247

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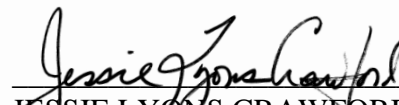
attorneyjlcrawford@verizon.net

Attorney for the Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of November, 2016, a copy of the foregoing Motion for Enlargement of Time was electronically mailed via the Court's CM/ECF to:

Nichole C. Gatewood, Esq.
Office of the Attorney General
St. Paul Plaza - 19th Floor
200 St. Paul Place
Baltimore, MD 21202


JESSIE LYONS CRAWFORD, ESQ.
Attorney for the Plaintiff